



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

February 17, 2023

BY ECF

The Honorable Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Re: *United States v. Isabella Pollok, 20 Cr. 110 (LJL)*

Dear Judge Liman:

Enclosed for the Court's consideration is a consent preliminary order of forfeiture in the above-referenced case. Counsel for the Government and counsel for the defendant have executed the consent preliminary order of forfeiture, and the defendant intends to execute it on the date of sentencing, February 22, 2023.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
Mollie Bracewell
Lindsey Keenan
Danielle R. Sassoon
Assistant United States Attorneys
(212) 637-2218 / 1565 / 1115

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA : CONSENT PRELIMINARY ORDER
- v. - : OF FORFEITURE/
ISABELLA POLLOK, : MONEY JUDGMENT
Defendant. : S3 20 Cr. 110 (LJL)
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WHEREAS, on or about September 7, 2022, ISABELLA POLLOK (the “Defendant”), was charged in a Superseding Information, S3 20 Cr. 110 (LJL) (the “Information”), with conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956 (a)(1)(B)(i) (Count One);

WHEREAS, the Information included a forfeiture allegation as to Count One of the Information, seeking forfeiture to the United States;

WHEREAS, on or about August 22, 2022, the Defendant pled guilty to Count One of the Information, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Count One of the Information and agreed to forfeiture to the United States;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$2,444,349 in United States currency representing, pursuant to Title 18, United States Code, Section 982(a)(1), the property involved in the offense charged in Count One of the Information, for which the Defendant is jointly and severally liable with her co-defendant, Lawrence Ray, and the forfeiture money judgment entered against Lawrence Ray in this case on January 31, 2023; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the property involved in Count One of the Information cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorneys, Mollie Bracwell, Lindsey Keenan, and Danielle Sasso of counsel, and the Defendant, and her counsel, David Bertan, Esq and Jill Shellow, Esq., that:

1. As a result of the offense charged in Count One of the Information, to which the Defendant pled guilty, a money judgment in the amount of \$2,444,349 in United States currency (the “Money Judgment”), representing the property involved in the offense charged in Count One of the Information, for which the Defendant is jointly and severally liable with her co-defendant Lawrence Ray, and the forfeiture money judgment entered against Lawrence Ray in this case on January 31, 2023, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant, ISABELLA POLLOK, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Marshals Service, and delivered by mail to the United States Attorney’s Office, Southern District of New York, Attn: Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew’s Plaza, New York, New York 10007 and shall indicate the Defendant’s name and case number.

4. The United States Marshals Service is authorized to deposit the payments on the Money Judgment in the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. In the event Defendant makes a payment to the Government in the amount of \$85,000 in United States currency, the Government shall deem the entire Money Judgment satisfied.

6. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

7. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

8. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

9. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

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10. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: 
Mollie Bracewell
Lindsey Keenan
Danielle Sassoon
Assistant United States Attorneys
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2218/1565/1115

2/17/2023
DATE

ISABELLA POLLOK

By: _____
Isabella Pollok

DATE

By: 
David Bertan, Esq.
Jill Shellow, Esq.
Attorneys for Defendant
41 East 11th Street 11th Floor / 15 Chester Avenue
New York, NY 10003 / White Plains, NY 10601

February 17, 2023
DATE

SO ORDERED:

HONORABLE LEWIS J. LIMAN
UNITED STATES DISTRICT JUDGE

DATE